

Licensing Panel (Licensing Act 2003 Functions)

Date: **10 March 2026**

Time: **10.00am**

Venue **Virtual**

Members: **Councillors:** Cattell, Nann and Thomson

Contact: **Marie Button**
Democratic Services Officer
01273 291214
marie.button@brighton-hove.gov.uk

Agendas and minutes are published on the council's website www.brighton-hove.gov.uk.
Agendas are available to view five working days prior to the meeting date.

Electronic agendas can also be accessed through our meetings app available through
ModernGov: [iOS/Windows/Android](#)

This agenda and all accompanying reports are printed on recycled paper

AGENDA

1 TO APPOINT A CHAIR FOR THE MEETING

WELCOME & INTRODUCTIONS

2 PROCEDURAL BUSINESS

(a) **Declaration of Substitutes:** Where Councillors are unable to attend a meeting, a substitute Member from the Licensing Committee may attend, speak and vote in their place for that meeting.

(b) **Declarations of Interest:**

- (a) Disclosable pecuniary interests;
- (b) Any other interests required to be registered under the local code;
- (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

- (i) the item on the agenda the interest relates to;
- (ii) the nature of the interest; and
- (iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

(c) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted, or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

NOTE: Any item appearing in Part Two of the Agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls.

3 DIALS CONVENIENCE STORE LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS)

7 - 64

Contact Officer: Charles Boufrahi
Ward Affected: Goldsmid

Date of Publication – Tuesday 3 March 2026

The City Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public. Provision is also made on the agendas for public questions to committees and details of how questions can be raised can be found on the website and/or on agendas for the meetings.

The closing date for receipt of public questions and deputations for the next meeting is 12 noon on the fourth working day before the meeting.

Meeting papers can be provided, on request, in large print, in Braille, on audio tape or on disc, or translated into any other language as requested.

Infra-red hearing aids are available for use during the meeting. If you require any further information or assistance, please contact the receptionist on arrival.

FURTHER INFORMATION

For further details and general enquiries about this meeting contact Marie Button (01273 291214, email marie.button@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

WEBCASTING NOTICE

This meeting may be filmed for live or subsequent broadcast via the Council's website. At the start of the meeting the Chair will confirm if all or part of the meeting is being filmed. You should be aware that the Council is a Data Controller under the Data Protection Act 1998. Data collected during this web cast will be retained in accordance with the Council's published policy.

Therefore, by entering the meeting room and using the seats in the chamber you are deemed to be consenting to being filmed and to the possible use of those images and sound recordings for the purpose of web casting and/or Member training. If members of the public do not wish to have their image captured, they should sit in the public gallery area.

ACCESS NOTICE

The Public Gallery is situated on the first floor of the Town Hall and is limited in size but does have 2 spaces designated for wheelchair users. The lift cannot be used in an emergency. Evac Chairs are available for self-transfer and you are requested to inform Reception prior to going up to the Public Gallery. **For your own safety please do not go beyond the Ground Floor if you are unable to use the stairs.**

Please inform staff on Reception if this affects you so that you can be directed to the Council Chamber where you can watch the meeting or if you need to take part in the proceedings e.g. because you have submitted a public question.

FIRE / EMERGENCY EVACUATION PROCEDURE

If the fire alarm sounds continuously, or if you are instructed to do so, you must leave the building by the nearest available exit. You will be directed to the nearest exit by council staff. It is vital that you follow their instructions:

- You should proceed calmly; do not run and do not use the lifts;
- Do not stop to collect personal belongings;
- Once you are outside, please do not wait immediately next to the building, but move some distance away and await further instructions; and
- Do not re-enter the building until told that it is safe to do so.

Licensing Panel (Licensing Act 2003 Functions)

Brighton & Hove City Council

Subject:	Application for a New Premises Licence under the Licensing Act 2003		
Premises:	The Dials Convenience Store, 157 Dyke Road, Brighton, BN3 1TJ		
Applicant:	Isteph Ayoub		
Date of Meeting:	10 March 2026		
Report of:	Corporate Director for City Operations		
Contact Officer:	Name:	Donna Lynsdale	Tel: (01273) 294429
	Email:	donna.lynsdale@brighton-hove.gov.uk	
Ward(s) affected:	Goldsmid		

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 To determine an application for a New Premises Licence under the Licensing Act 2003 for The Dials Convenience Store.

2. RECOMMENDATIONS:

- 2.1 That the Panel determine an application for a New Premises Licence under the Licensing Act 2003 for The Dials Convenience Store.

3. CONTEXT/BACKGROUND INFORMATION & CONSULTATION

- 3.1 The application is for a New Premises Licence under the Licensing Act 2003. The application proposes

a convenience store selling alcohol for off-sales

- 3.2 Part M (Operating Schedule) of the application is detailed at Appendix A and the plan of the premises is attached at Appendix B

- 3.3 Summary table of proposed activities

	Proposed
Supply of Alcohol	Every Day: 08:00 – 23:00 Off the Premises
Hours premises are open to public	Every Day: 08:00 – 23:00

- 3.4** Special Stress Area: The premises falls within the Special Stress Area. This area is deemed an area of special concern in terms of the levels of crime, disorder, and public nuisance experienced within it. (See paragraphs 3.3 – 3.3.5)

Representations received

- 3.5** Details of the representations made are notified to applicants on receipt by the Licensing Authority using a pro-forma. A summary appears below:
- 3.6** 14 representations were received 1 in support. They were received from local residents, local businesses and the Licensing Authority.
- 3.7** Representation(s) received had concerns relating to Prevention of Crime and Disorder, Public Safety, Prevention of Public Nuisance and Protection of Children from Harm.
- 3.8** Full details of the representations are attached at Appendix C and applicant's response to the representations are attached to Appendix D. A map detailing the location of the premises is attached at Appendix E.

4. COMMENTARY ON THE LICENSING POLICY

- 4.1** The following extracts from Brighton & Hove City Council Statement of Licensing Policy are considered relevant to this application and **are numbered as they appear in the policy**:

1 Introduction

1.1 This Statement of Licensing Policy has been prepared in accordance with the provisions of the Licensing Act 2003 (the Act) and having regard to Guidance issued by the Home Office under Section 182 of the Act.

This policy takes effect from the 5 January 2026. The licensing authority is Brighton & Hove City Council.

The purpose of this statement is to promote the licensing objectives and set out a general approach to making licensing decisions.

The discretion of the licensing authority in relation to applications under the act is only engaged if 'relevant representations' are made by other persons or responsible authorities.

This policy will inform the approach to be taken when deciding applications and imposing conditions when relevant representations are received. It is also intended as a guide for applicants as to what to include in their operating schedules, always recognising that if no representations are received, the application must be granted.

The licensing authority must carry out its functions with a view to promoting the licensing objectives and this policy is framed around those objectives. Each application will be given individual consideration on its merit.

The scope of this policy covers the following:

- Retail sales of alcohol.
- The supply of alcohol by or on behalf of a club, or to the order of, a member of the club.
- The provision of regulated entertainment.
- The provision of late night refreshment.

1.2 The licensing objectives are:

- (a) the prevention of crime and disorder.
- (b) public safety.
- (c) the prevention of public nuisance; and
- (d) the protection of children from harm.

1.3 Scope

1.3.1 Licensing is about regulating licensable activities on licensed premises, by qualifying clubs and at temporary events. Any conditions attached to various authorisations will be focused on matters which are within the control of individual licensees and others with relevant authorisations, i.e. the premises and its vicinity. Each application will be given individual consideration on its merit. Nothing in this policy shall undermine the right of any individual to apply under the terms of the act for a variety of permissions and to have any such application considered on its individual merits. Similarly, nothing in this policy shall override the right of any person to make representations on an application or seek a review of a licence or certificate where provision has been made for them to do so in the act.

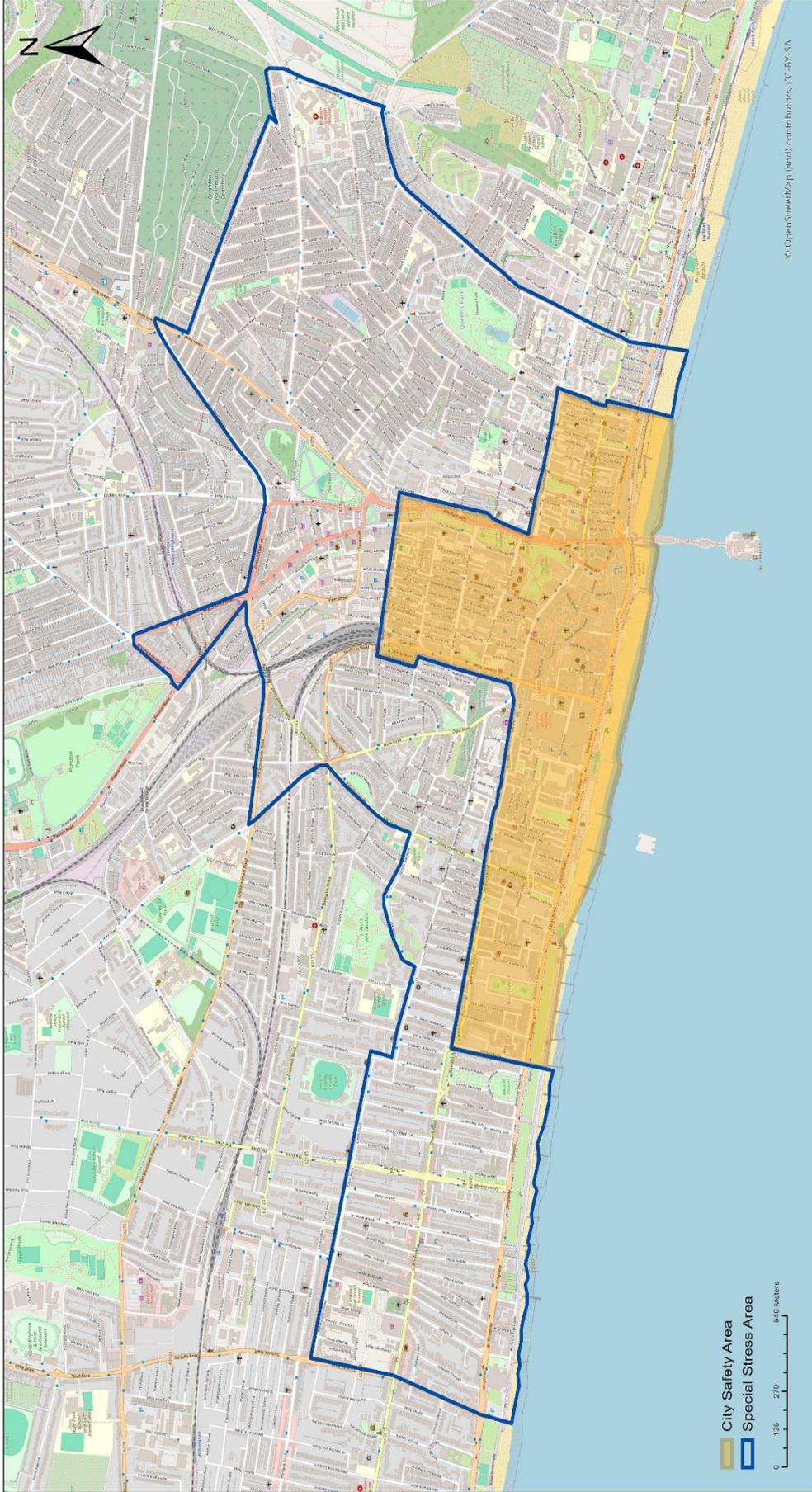
3. Special Policies and Initiatives

3.3 Special Stress Area

Since March 2008, the licensing authority has kept the Special Stress Area (SSA) under review which included in Nov 2018, expanding the SSA into Central Hove and in Nov 2020 it was expanded further into Preston Road and Beaconsfield Road.

3.3.1 The map below details the area of the city centre which borders the City Safety Area and which is deemed an area of special concern in terms of the levels of crime and disorder and public nuisance experienced within it. The area recommended for further monitoring and detailed guidance within the Special Policy comprise the following as pictured below delineated in blue.

City Safety Area and Special Stress Area, July 2025



Brighton and Hove City Council, Public Health Intelligence Team
© Crown copyright and database rights 2025, OS AC0000849956

The Special Stress Area - an area bounded by and including: The west side of Hove Street/Sackville Road, northwards to the intersection with the north side of Blatchington Road, along north side of Blatchington Road and Eaton Road, southwards at the junction onto the east side of Palmeira Avenue and then eastwards at the junction onto the north side of Landsdowne Road; eastwards to the junction with Furze Hill, along the north side Furze Hill to its end and then due east along the north side of Victoria Road to its junction with Montpelier Road (west side), north to where Montpelier Road joins Vernon Terrace then north to Seven Dials; north west along the west side of Dyke Road until the junction with the Old Shoreham Road, then East along the north side of Old Shoreham Road, continuing on the north end of New England Road, north west at Preston Circus at the junction of New England Road and Preston Road along the west side of Preston Road until the junction with Stanford Avenue then and north east along the north side of Stanford Avenue until the junction with Beaconsfield Road, south along the east side of Beaconsfield Road until the junction at Preston Circus and Viaduct Road, eastwards along the north side of Viaduct Road, then at the junction with Ditchling Road, North East along the north side of Upper Lewes Road until the junction with Lewes Road; south along the Lewes Road to junction with Hartington Road, along the north side of Hartington Road until the junction with St. Helen's Road, south into the north side of May Road, eastwards until its junction with Freshfield Road (east side), then south into Upper Bedford Street, into Bedford Street to the mean water mark south of Bedford Street, then due west until the mean water mark south of Lower Rock Gardens; North on Upper Rock gardens, to the north side of Eastern Road, west along Eastern Road and Edward Street until Grand Parade, north along the Eastern side of Grand Parade to the junction of York Place and Trafalgar Street, West along the Northern boundary of Trafalgar Street, up to and including Surrey Street and then South along the Western boundary of Queens Road to the junction with Air Street, West along the north side of Air Street, South-west to the junction of Western Road Brighton, then West along the North side of Western Road Brighton, South along the West side of Holland Road to the mean water mark south of Kingsway and Kingsway Esplanade as far as the west side of Hove Street/ Sackville Road.

- 3.3.2 This Special Stress Area (SSA) is of concern to the licensing authority because of the relatively high levels of crime and disorder and nuisance experienced within it. The area will be kept under review.
- 3.3.3 For all new and varied applications for premises and club premises certificates within the SSA operators will be expected to pay special attention when drawing up their operating schedules and to make positive proposals to ensure that their operation will not add to the problems faced in these areas. Appendix A of the SoLP sets out a list of potential measures the licensing authority considers may be appropriate. These may be more or less appropriate depending upon the style of operation applied for.
- 3.3.4 On receipt of any application in the SSA, where a relevant representation has been made, the licensing authority will scrutinise the application carefully and will look at the measures proposed in the operating schedules and compare them to the measures set out in Appendix A, Licensing Best Practice Measures. Where

discretion has been engaged, those applications which fall short may be refused or conditions applied to comply with policy measures.

3.3.5 The Licensing Authority will keep the City Safety Area and Special Stress Area under review. Should the authority find that problems of crime and disorder or nuisance are not improving, or are worsening, the Special Policy will be reviewed.

3.4 The Matrix Approach

The Licensing Authority will support:

3.4.1 Diversity of premises: ensures that there is a mix of the different types of licensed premises and attracts a more diverse range of customers from different age groups, different communities and with different attitudes to alcohol consumption. It gives potential for positively changing the ambience of the city or an area of it. This will have a positive effect in reducing people’s fear of crime and in increasing the number of evening visitors to the city centre. The Community Safety and Crime Reduction Strategy [Community safety and crime reduction strategy 2023 to 2026](#) recognises that too many single uses in a confined area and patrons turning out onto the streets at the same time may create opportunities for violent crime and public disorder and therefore supports: mixed use venues encouraging a wider age balance.

3.4.2 A ‘Matrix’ approach to licensing decisions has been adopted and is set out below. It provides a firm framework of what the licensing authority would like to see within its area and gives an indication of the likelihood of success or otherwise to investors and businesses making applications. It underpins the City Safety Policy (see above at 3.1).

Matrix approach for licensing decisions in a Statement of Licensing Policy (times relates to licensable activities)

	City Safety Area	Special Stress Area	Other Areas
Food & dining venues	1 am	1 am	1 am
Fast food premises	No	Midnight Deliveries until 2am	Midnight Deliveries until 2am
Cafe	10pm	10pm	10pm
Performance venues	Midnight	Midnight	Midnight
Grassroots Music venues	Midnight	1am	1am
Nightclubs	No	No	No
Public houses and bars	No	Midnight	Midnight
Non-alcohol led venues	Midnight	Midnight	Midnight
Off licences	No	No	Yes (Up to 11pm – (see note f below)
Shared workplaces, co-working offices	Midnight	Midnight	Midnight
Members’ clubs	11pm	Midnight	Midnight

3.4.3 Explanatory notes on matrix

Definitions: each venue will be considered individually, and the below definitions may need to be applied flexibly depending on the business model of the specific venue

Food and dining venues	<ul style="list-style-type: none"> • Provide substantial table meals to customers dining at the premises • Food is prepared on site • Alcohol is sold to customers ancillary to a substantial table meal for consumption at the premises (or in an associated outdoor dining area) only • If takeaway service is provided, must be ancillary to provision of substantial table meals
Fast food premises	<ul style="list-style-type: none"> • Provide late night refreshment of fast food intended for immediate consumption on the premises or takeaway • Food is served in disposable packaging
Cafes	<ul style="list-style-type: none"> • Sell alcohol to customers for consumption on the premises in addition to other food and drink products • Food and drink is served to customers seated at a table including to any outdoor designated area • Food is prepared on site and the premises will have a fully operational kitchen • A full menu of the hot and cold food items available will be clearly on display within the premises. • Generally operate in the daytime and early evening only.
Performance venues	<ul style="list-style-type: none"> • Provide performances of live music, theatre, dance and other creative arts to entertain an audience • Includes live music venues, concert venues, cabarets and theatres • Does not include karaoke or Grassroots Music Venues
Grassroots Music Venues	<ul style="list-style-type: none"> • Grassroots Music Venues are small, typically local venues that provide a platform for emerging and independent musicians to perform. They are often pubs, clubs, or other small spaces where artists can hone their craft, gain experience, and connect with a local audience. These venues play a crucial role in nurturing talent and supporting the development of the music scene. • A member of Music Venues Alliance Brighton or Music Venues Trust or similar
Nightclubs	<ul style="list-style-type: none"> • Provide regulated entertainment and the sale of alcohol • Main licensable activity is recorded and live music with provision of dance floors, sound systems and light displays • Generally, operate at night and into early hours of the morning
Public houses and bars	<ul style="list-style-type: none"> • Sell alcohol to customers for consumption on the premises • Sale of alcohol takes place at the bar

	<ul style="list-style-type: none"> • Includes tap rooms and craft beer pubs • May also carry out other licensable activities • Does not include cafes
Non-alcohol led venues	<ul style="list-style-type: none"> • Cultural venues such as art galleries, museums, theatres • Experiential entertainment venues such as escape rooms and social gaming venues • Alcohol is sold to customers for consumption on the premises • Supply of alcohol is ancillary to entertainment offering • Does not include shared workplaces and co-working offices
Off licences	<ul style="list-style-type: none"> • Supermarkets and convenience stores which supply alcohol for consumption off the premises in addition to other retail products • Includes alcohol delivery services fulfilling remote orders for sale of alcohol • Restrictions on ABV% e.g. the Sensible on Strength 6% condition
Shared workplaces, co-working offices	<ul style="list-style-type: none"> • Office premises in which individual workstations and meeting rooms are rented to solo workers and small businesses
Members' clubs	<ul style="list-style-type: none"> • Premises authorised to carry out licensable activities under a club premises certificate

3.4.4 **Each application will be considered on its own merits.** However, the Licensing Authority will apply the Matrix Approach in all cases unless there are exceptional circumstances which justify a different approach.

- a). **Applications within the CSA** will be subject to a special policy requiring robust measures to be included in the operating schedule to promote safety. Applications within the SSA will be subject to the special stress policy set out in 3.3.
- b). **Exceptional circumstances.** The Licensing Authority will determine exceptional circumstances on a case-by-case basis. An example of exceptional circumstances could be where the applicant has provided sufficient assurances to the responsible authorities that they do not make relevant representations against the application. Another example is where the application is for a variation to an existing premises licence and the applicant satisfies the criteria for a “good operator”.
- c). **Activities which the Licensing Authority values and wishes to encourage:** LGBTQ+ and TNBI venues; outdoor regulated entertainment; cafes; members’ clubs; traditional pubs (outside the CSA); non-alcohol led licensable activities, especially within the city centre. The Licensing Authority will aim to permit these types of venues in appropriate locations, but will consider each case – including any relevant representations – on its own merits.
- d). **Location.** Consideration will be given to the character of the area of the venue in every case. In residential areas, the Licensing Authority will pay particular attention to the potential of a venue to cause public nuisance, especially noise

disturbance, littering and anti-social behaviour. In these areas, an early closing time may be appropriate.

- e). **Food and dining venues.** The Licensing Authority will require conditions to ensure that these venues are food-led, such as: alcohol to be sold only to customers taking a substantial table meal; no takeaway service of food for immediate consumption (an ancillary meal delivery service is acceptable). Where the venue has an agreement to use an adjacent outdoor area, the Licensing Authority will require evidence that a pavement licence has been granted for use of the highway (for highway land) or landowner's consent (for land other than a highway).
- f). **Off licences.** Particular consideration will be given to applications for off-licences in areas which already have one or more off-licences in close proximity, due to concerns about street drinking, underage sales and anti-social behaviour. Where relevant representations are made raising these issues, the application is likely to be refused or – if it is appropriate to grant the application – granted subject to a terminal hour in line with neighbouring off licences.
- g). **Outdoor events.** Outdoor events will generally be supported where they have been arranged through the Council's event planning process.

3.5 Good Operator Policy

3.5.1 Good operators of licensed premises are valuable partners in assisting the Licensing Authority to promote the licensing objectives in Brighton and Hove and contributing to our city's unique and vibrant culture. The Licensing Authority has therefore decided to introduce a new policy measure – the Good Operator Policy – to reward and incentivise the responsible management of licensed premises. Under the Good Operator Policy, there will be a presumption in favour of granting applications to vary premises licences which are submitted by good operators as defined by this policy. This includes variations to trading hours beyond the hours indicated by the Matrix Approach. In general, the Licensing Authority will consider granting such applications to be appropriate for promoting the licensing objectives – unless there is clear and compelling evidence they would be undermined by granting the application.

3.5.2 A "good operator" is an applicant for an application to vary a premises licence who satisfies all of the following criteria:

- at the time of making the variation application, and at the time the application is determined, they are the holder of the premises licence subject to the application
- in the 3 to 5 year period prior to submitting the application, the applicant has not been subject to any formal intervention by the responsible authorities in connection with that [or any other] premises in Brighton and Hove.
- Formal intervention includes the following; a formal written warning; an application for review or summary review; a closure notice or closure order; a prosecution for an offence under the Licensing Act 2003; a penalty for employing illegal workers; or an abatement notice.

3.7. Off Licences

In recent years there has been a noticeable shift towards more people buying alcohol from shops and drinking at home prior to going into premises such as pubs and clubs. The council is concerned that alcohol loading from off-licence sales is a significant problem in the city and adversely affects the licensing objectives as it gives rise to problems of drunkenness, disorderly behaviour and a higher risk of alcohol sales to children. Representations from the police, local residents and the director of public health at licensing panel hearings have testified to these problems. Additionally, regular test purchasing carried out by Sussex Police in partnership with BHCC Trading Standards has identified that off licences continue to be a place where young people under the age of 18 can purchase alcohol illegally.

3.7.1 The city safety policy and area as well as the special stress area apply to off-licences as explained in the matrix approach at 3.5. But in general where applications are made for new premises or variations to existing licences, and where the police or others make representations against the grant of a further licence for off sales, the council will give specific consideration to restricting the number, type, and the hours of premises selling alcohol exclusively for consumption off the premises, training and levels of staffing, are appropriate to ensure that the licensing objectives are promoted in what may be challenging circumstances.

3.7.2 The Licensing Authority encourage off licences to join the Council led "Sensible on Strength" scheme to reduce the availability of cheap super strength beers and ciders. Off licences voluntarily sign up not to sell cheap super-strength beers, lagers and ciders over 6% ABV and operate good practice measures (see 3.7.3), for which they receive an accreditation as a responsible retailer.

3.7.3 Areas of best practice that may be included in an Operating Schedule include;

- the installation of a digital CCTV system by liaison with, and to a standard approved by Sussex Police
- Challenge 25 policy
- Refusals system
- Documented staff training including underage sales, drunkenness and proxy sales
- Voluntary restriction of high strength alcohol - operating schedules may be used to limit high ABV beers, lagers and ciders
- BCRP membership (or other accredited scheme)
- No sale of single cans
- Displays should not be located at the entrance/exit points or near checkouts

- Restrictions on types of alcohol e.g. specialist or geographical region only being sold

3.10 Promoters and irresponsible drinks promotions

3.10.1 The Licensing Act 2003 makes no mention or provision for the use of promoters within licensed premises. Many of the late night bars and clubs within the Brighton & Hove area regularly hire promoters to sell nights at their venues. Issues that have been identified with the use of promoters within the nighttime economy, in recent years include individual promoters vouching for underage customers to get them inside licensed premises where they can access alcohol, providing flyers to passersby who throw them on the floor and irresponsible promotions for their nights. Many premises now have an agreement with their promoter for acceptable promotions and behaviour which includes the signing of a written contract of expectations. This shows premises evidencing their due diligence and ensures that promotion companies know what is expected of them. The contract could include obligations to pick up self-generated litter, verification of ages of their customers and users of their social media, promoters being over the age of 18 and responsible advertising on social media.

3.10.2 The Licensing Authority expect licensed premises to develop staff policy and training on recognising signs of drunkenness, spiking and vulnerability, for example, offering drinking water and tips for refusing customers who appear drunk. And discourage company policies that promote bonuses and sales incentives for selling alcohol. Licensing Authority will expect necessary precautionary processes to restrict drunkenness, e.g. Licensing Guidance states happy hours should not be designed to encourage individuals to drink excessively or rapidly.

6. Prevention of Crime and Disorder

The following details and measures are intended to address the need for the prevention of crime and disorder which may be associated with licensed premises and certificated club premises. Conditions attached to licences and certificates will, as far as possible, reflect local crime reduction strategies.

6.1.1 The licensing authority acknowledges that training and good management play a key part in preventing alcohol and drug related crime. The authority expects that all licensees of on-licensed premises attend training programs which will raise their awareness of the issues relating to spiking, drugs and violence in licensed premises, and that suitable training be extended to all bar staff and door supervisors so that drug dealers and users will be deterred from using licensed premises for illegal purposes and that incidents of violence in licensed premises will be reduced. Licensees are also encouraged to attend training programs to help identify children at risk and issues of basic child protection and vulnerable individuals. It is the duty of the designated premises supervisor (DPS) to train staff on induction concerning conditions on their premises licence and their responsibility to uphold all four licensing objectives.

6.1.2 It is expected that the DPS will spend a significant amount of time on the premises. When not on the premises it will be essential that the DPS is

contactable, particularly should problems arise with the premises and that staff are authorised by the DPS

- 6.1.3 The location of violent attacks, anti-social behaviour and hate crime or related incidents may be used to justify closing times.

6.3 Care, control and supervision of premises

6.3.1 The Licensing authority supports the Brighton Crime Reduction Partnership and other approved schemes. Where appropriate, premises licence holders should be members of the BCRP for the deterrence to violent crime that such membership provides. The BCRP NightSafe radio scheme is normally expected as an operational requirement for city centre bars, clubs and pubs and is an example of best practice in achieving the aim of reducing crime and disorder and improving public safety. Well managed pub-watch schemes provide information exchange between the premises licence holders and responsible authorities that reduce and deter violent crime and disorder. The council will support a responsible licensing scheme.

6.3.2 The effective management and supervision of a venue is a key factor in reducing crime and disorder, both within it and outside. The police will consider the applicants, objecting to the application where appropriate. The police may suggest crime prevention measures in relation to, for example, the internal layout of the premises, closed-circuit television, help points, lighting and security staff. The police may ask for conditions which support such measures to be imposed when licensing applications are granted, eg type of licence, capacity, operating hours restrictions.

6.3.3 Following the grant of a licence, the management and supervision of the premises, in so far as it might impact on crime and disorder, will continue to be monitored. Particular attention will be paid to any licensed premises where there is evidence of criminal activity or any association with racist or homophobic crime. The licensing authority will keep itself well briefed on the nature, location and type of premises where alcohol related violence and disorder are occurring so it can take full account of the facts and avoid exacerbating problems as required by the Community Safety Strategy. Where licensed premises are found to cause nuisance or be associated with disorder or unreasonable disturbance, the review process may be invoked, and powers of revocation or the imposition of conditions may be considered. Conditions may include use of closed-circuit television, licensed door supervisors and earlier closing times. Such action to restrict the operation may be taken for trial periods to allow businesses an opportunity to remedy existing disorder, nuisance or disturbance.

6.3.4 This policy recognises the use of registered Door Supervisors. All Door Supervisors will be licensed by the Security Industry Authority. Mobile security units and similar systems are in use by some premises operators as a means of providing security cover at very short notice at premises which may not normally require a permanent security presence. This policy endorses the use of units following such guidance and standards in appropriate circumstances.

- 6.3.5 The development of codes of practice and general operating standards for security companies is encouraged for local businesses; premises operators are urged to ensure that security services, when engaged, are provided by suitably qualified businesses operating to recognised standards and who should be working towards SIA accreditation.
- 6.3.6 Enforcement will be achieved by the enforcement policy appended (Appendix B).

7. Public Safety

The following details and measures are intended to address the need for the protection of public safety which may be associated with licensed premises and certificated club premises.

- 7.1.1 The permitted capacity is a limit on the number of persons who may be on the premises at any time, following a recommendation by the relevant fire and rescue authority under the Regulatory Reform (Fire Safety) Order 2005. For any application for a premises licence or club premises certificate for premises without an existing permitted capacity where the applicant wishes to take advantage of the special provisions set out in section 177 of the 2003 Act, the applicant should conduct their own risk assessment as to the appropriate capacity of the premises. They should send their recommendation to the fire and rescue authority which will consider it and decide what the “permitted capacity” of those premises should be.
- 7.1.2 Conditions may be imposed in accordance with operating schedules to protect public safety including where justified:
- a). provision of closed-circuit television and panic buttons.
 - b). use of shatterproof drinking vessels; bottles requiring use of toughened glass or reusable plastic should normally be required unless applicants can show exceptional reasons.
 - c). use of door supervisors, licensed by the Security Industry Authority.
 - d). requirement of a minimum of a licensed door supervisor for every 100 customers in nightclubs and large city centre pubs or as indicated by risk assessment.
 - e). occupant capacity conditions will be applied where appropriate.
 - f). the provision of designated and suitably trained first aiders.
- 7.1.3 Where appropriate, licence holders or their authorised representatives will submit event safety plans and operating manuals, attend Event Planning Teams or Safety Advisory Groups and similar meetings prior to large events and shall be part of Event Liaison Teams during such events. Due regard shall be had to relevant guidance and publications including, for example: HSE approved code of practice for events.

8. Prevention of Public Nuisance

The following details and measures are intended to address the need for the prevention of public nuisance which may be associated with licensed premises and certificated club premises:

- 8.1.1 In determining applications for new and varied licences, regard will be had to the location of premises, the type and construction of the building and the likelihood of nuisance and disturbance to the amenity of nearby residents by reason of noise from within the premises, as a result of people entering or leaving the premises or from individuals or groups of customers gathered outside (e.g. in order to smoke).
- 8.1.2 Applications for new licences or for the extension in size of licensed premises should not normally be granted if the premises will use amplified or live music and operate within or abutting premises containing residential accommodation except that occupied by staff of the licensed premises. A condition may be imposed on new licences that entertainment noise shall be inaudible in any residence. Noise emanating from within licensed premises should not normally be audible outside.
- 8.1.3 In determining applications for new licences or extensions in hours or terminal hours of licensed premises, regard will be had to late night public transport availability and location of taxi ranks to aid dispersal of customers.
- 8.1.4 Reasonable controls are available to all premises operators to minimise the impact of noise from customers outside. The council's Environmental Health Department has issued guidance on a number of steps that can be taken in this respect which are endorsed by this policy (see 8.2 below).

8.2 Smoking Advice

8.2.1 Premises licence holders will be expected to:

- Develop a management plan on how to manage smoking on their premises and ensure that all staff are aware of the contents of this plan, and that it is effectively implemented. Noise from people smoking and talking can be intermittent, vary in character and volume and be intrusive. An effective smoking management plan will help prevent neighbours being disturbed.
- Comply with any planning conditions restricting the use of outdoor areas.
- Ensure that any structures used by smokers comply with the design criteria detailed in the Health Act 2006 and that any structures, awnings, retractable canopies, etc have the relevant planning permission.
- Ensure any new lighting to outdoor areas must be designed so as not to cause a light nuisance to neighbours and again have the relevant planning permission and building control consent.
- Ensure that the conditions on the premises licence are complied with. There may be conditions restricting the hours of use of gardens and outdoor areas. Having

reviewed the contents of the premises licence it may be necessary to request a variation of your licence.

- Licence tables and chairs on the Public Highway under the provisions of the Highways Act 1980. These licences may have conditions restricting the times that the area can be used.
- Ensure drinks, glasses and bottles are not taken onto the highway unless there is a tables and chairs licence permitting use. A system should be adopted to prevent theft and 'spiking' of drinks and reminding customers not to leave unattended items.
- Discourage smokers remaining in gardens and outdoor areas and determine terminal hours.
- Discourage smokers remaining outside by removing/disabling tables and chairs or prohibiting their use after a certain time. Lights and heaters will also be turned off.
- Introduce a system that after a certain time the number of smokers outside are restricted to a maximum number. Staff will be needed to manage this restriction.
- Employ staff and/or SIA registered door supervisors to manage doors and control customers and smokers entering and leaving the premises. Staff positioned on the doors can help to encourage customers not to cause a noise problem. It may be that staff are required to manage doors after a certain time, particularly during the hours when neighbouring residents are trying to sleep.
- Ensure door supervisors maintain order outside venues and protect customer safety. BCRP supports the use of Night Safe. Radio net and other pager systems and pub watch schemes can be used to provide for rapid police response and alert other venues where customers and staff are endangered.
- Position signs to remind customers that the premises is in an area where people live. It is not always obvious in busy commercial streets with flats above. By changing the design and wording of signs customers do not forget. Signs can be located in and outside the premises and on tables.
- Use CCTV to manage outside areas.

8.2.2 Licensed premises should normally display prominent, legible signs at exits reminding customers to leave in a quiet, peaceful, orderly manner.

9. Protection of Children from Harm

The following details and measures are intended to address the need for the protection of children from harm; this includes emotional and physical harm which may be associated with licensed premises and certificated club premises (for example the exposure too early to strong language and sexual expletives, e.g. in the context of film exhibitions or where adult entertainment is provided). It is intended that the admission of children to premises holding a premises licence

or club premises certificate should normally be freely allowed without restricting conditions (unless the 2003 Act itself imposes such conditions or there are good reasons to restrict entry or to exclude children completely).

- 9.1.1 Licensees should note the concern of the authority that drink related disorder frequently involves under 18's. To prevent illegal purchases of alcohol by such persons, all licensees should work with a suitable 'proof of age' scheme and ensure that appropriate identification is requested prior to entry and when requesting alcohol, where appropriate. Appropriate forms of identification are currently considered to be those recommended by the Home Office, police, trading standards officers and their partners (eg passport, photo driving licence or pass card). The advent of digital identification will bring new technologies and challenges which responsible authorities and licensees will need to be mindful of and have a personal responsibility to remain informed and trained on.
- 9.1.2 It is the licensing authority's expectation that all staff responsible for the sale of intoxicating liquor receive information and advice on the licensing laws relating to children and young persons in licensed premises. Licensed premises staff are required to take reasonable steps to prevent under age sales. The licensing authority will not seek to limit the access of children to any premises unless it is necessary for the prevention of emotional or psychological harm to them. Each application will be considered on its own merit but particular areas that will give rise to concern in respect of children are to be found in section 9.1.4 below.
- 9.1.3 To reduce alcohol-induced problematic behaviour by under 18 year olds, to enforce underage purchase and drinking laws and to assist in the protection of children from harm, the licensing authority supports the following measures: -
- a). Police should exercise powers (Confiscation of Alcohol (Young Persons) Act 1997) to remove alcohol from young people on the street
 - b). Police and trading standards should implement test purchasing to reduce sales to under 18s in on and off sales licensed premises
 - c). Further take-up of proof of age schemes will be promoted
 - d). In-house, mystery shopper type schemes operated by local businesses will be supported
 - e). Providers of events specifically catering for unaccompanied children should consider whether all staff at such events need to be DBS checked
 - f). Use of a PSPO in the City Centre
- 9.1.4 The licensing authority will not seek to require that access to any premises is given to children at all times – under normal circumstances this will be left to the discretion of the licensee. The following areas give rise to concern in respect of children, who will normally be excluded from premises:
- where there have been convictions for serving alcohol to minors or with a reputation for underage drinking;
 - with a known association with drug taking or dealing;

- where there is a strong element of gambling on the premises;
- where entertainment of an adult or sexual nature is commonly provided;
- where premises are used primarily or exclusively for the sale and consumption of alcohol and there is little or no seating for patrons.

Options may include:

- limitations on the hours when children may be present;
- age limitations (below 18);
- limitations or exclusions when certain activities are taking place;
- requirements for an accompanying adult;
- full exclusion of people under 18.

9.1.6 Trading standards and the police undertake ongoing enforcement operations around under-age sales and test purchasing. Sussex Police and BCRP undertake work concerning proxy purchases and counterfeit ID as part of the partnership support work with Community Safety and Trading Standards.

9.1.7 Trading standards have a programme of business support including training for local businesses to avoid underage sales. Trading standards offer business support including for local businesses to avoid underage sales. The training also covers identifying fake ID's, Challenge 25, intoxication, proxy purchasing and implementing due diligence measures.

9.1.9 Trading Standards also supplies business support materials guidance and advice on the enforcement penalties on all age restricted products for example vapes, tobacco, fireworks etc.

10. Integration of Strategies

10.1 The licensing authority shall secure the proper integration of this policy with local crime prevention, planning policy, transport, tourism and cultural strategies by: -

- Liaising and consulting with Sussex Police, Community Safety Partnership Board, sustainability commission representatives and following the guidance in community safety and crime and disorder strategy
- Liaising and consulting with Public and Drug and Alcohol Programme Board
- Liaising and consulting with the East Sussex Fire & Rescue Service
- Liaising and consulting with the Safety Advisory Group (Emergency Planning)
- Liaising and consulting with the Planning authority
- Liaising and consulting with the Highways authority
- Liaising and consulting with local business and business associations. Having regard to any future documents issued relating to the Private Security Industry Act 2001, for example liaison or information sharing protocols
- Liaising and consulting with the Trading Standards Team, for example with regard to test purchasing codes of practice

10.1.1 In line with statutory requirements and the council's Public Sector Equality Duty, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations

between all people. This includes people who share protected characteristics, including but not limited to LGBTQIA+ people, disabled people, people from diverse ethnic and cultural backgrounds and people of all faiths and none.

10.1.2 This policy supports the aims of the tourism strategy, recognising the benefits for the tourism economy of creating a safer and more attractive city centre and improving competitiveness with other European cities. The Licensing Committee should receive any reports relevant to the needs of the local tourist economy and the cultural strategy for the area to ensure that it considers these matters.

10.1.3 The Licensing Committee should receive relevant information relating to the employment situation of the area and the need for new investment and employment where appropriate.

10.1.4 Specific conditions may be attached to premises licences to reflect local crime prevention strategies. Such conditions may include the use of closed circuit television cameras, use of the NightSafe radio system or accredited scheme, the provision and use of shatterproof drinking receptacles, drugs and weapons search policy, the use of registered door supervisors, specialised lighting requirements, hours of opening. Certificates issued to club premises shall reflect local crime prevention strategies and may include any or all of the requirements listed above.

10.1.5 The licensing authority will have regard to the need to disperse people quickly and safely from the city centre to avoid concentrations which may produce disorder and disturbance.

10.3 **Enforcement**

10.3.1 The Enforcement of licensing law and inspection of licensed premises is detailed in the Protocol between Sussex Police, the East Sussex Fire & Rescue Service and Brighton & Hove City Council. This protocol reflects the need for more efficient deployment of Police and Local Authority staff commonly engaged in licensing enforcement and can be found at Appendix D (Lead Agency Status) of the Statement of Licensing Policy. In addition, the Licensing Authority will have regard to its published Licensing Enforcement Policy in making enforcement decisions in accordance with Brighton & Hove City Council's Statement of Licensing Policy (Appendix B). In order to better target enforcement resources, inspections will be undertaken outside of normal office hours and the sharing of information between all enforcement agencies will be encouraged through joint meetings or similar arrangements.

10.3.2 Attention is drawn to the targeting of agreed problem and high risk premises requiring greater attention as identified in the protocol. A number of other council and government policies, strategies and guidance documents must be considered to complement the policy, including:

- Community Safety & Crime Reduction Strategy
- Drugs and alcohol strategies – local alcohol harm reduction strategy
- Objectives of the Security Industry Authority

- The Anti Social Behaviour Act 2003/ASBPC Act 2014
- The Health Act 2006
- The Violent Crime Reduction Act 2006
- Policing and Crime Act 2009

APPENDIX A – Licensing Best Practice Measures

Best Practice Measures to be included for consideration, in the CSA and the SSA

Matters that would normally be expected in operating schedules:

- A general knowledge and understanding of the Licensing Act 2003 (The Act).
- The adoption of a policy (e.g. Challenge 25) with acceptable proof of ID.
- A smoking policy which includes an assessment of noise and litter created by premises users
- The use of reusable plastic and polycarbonate drinking vessels and containers, especially in outside areas or after specified hours
- A policy in relation to searching customers and for drugs, weapons, seized or lost and found property
- Keep and maintain refusals book for registering attempts to buy alcohol by under-age persons or refusals to those intoxicated
- The installation of a digital CCTV system by liaison with, and to a standard approved by, Sussex Police. With access available to individuals working on the premises.
- A documented equalities and inclusion policy framework that demonstrates a commitment to creating a fair, diverse, and inclusive environment.
- Policies for dispersal of customers which may include signage regarding taxi services', telephone numbers and advice to respect neighbours and minimise noise, this also includes for customers using external areas.
- Licence holders should have clear documented policies and procedures in place which identify all public safety risks associated with their premises for both customers and staff and measures implemented to prevent, manage and respond to those risks.

Items to which positive consideration would be given:

- membership of Brighton Crime Reduction Partnership
- use of 'NightSafe' radio system or similar accredited scheme
- regular training and reminders for staff in respect of licensing legislation, policies and procedures; records of which should be properly recorded and available for inspection

- records of regular checks of all parts of the premises in relation to drug use
- systems in place to ensure details of barred clients are exchanged with other operators
- giving an agreed minimum notice of special events (screening of major sports events, birthday parties, adult entertainment, etc.) to relevant authorities and use of appropriate additional measures at such events
- Staff should be aware of their responsibilities regarding smoke-free legislation and for monitoring compliance

Recommend best practice for both on and off premises

- Staff must be aware of the risk of the problem of proxy sales and offer assistance to responsible authorities to deter offences
- Signage on premises should set out legal duties
- Voluntary restriction of high strength alcohol – operating schedules may be used to limit high ABV beers, lagers and ciders
- Staff training – in addition to personal licence holders training, staff must be adequately trained for duties
- Challenge 25 would be the norm, particularly in the off licence trade
- Appropriate signage and training for the deterrence of proxy sales

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 5.1 The licensing Act 2003 provides for fees to be payable to the licensing authority in respect of the discharge of their functions. The fee levels are set centrally at a level to allow licensing authorities to fully recover the costs of administration, inspection and enforcement of the regime.

Finance Officer Consulted David Wilder

Date: 03/03/2026

Legal Implications:

- 5.2 The licensing authority must act to promote the four licensing objectives which are:
- The prevention of crime and disorder
 - Public safety
 - The prevention of public nuisance
 - The protection of children from harm

The licensing authority must have regard to its statement of licensing policy and the guidance issued by the Secretary of State in carrying out its functions.

Lawyer Consulted: Rebecca Sidell

Date: 03/03/26

Equalities Implications:

- 5.3 Diversity is valued and strong, safe communities are vital to future prosperity. Licensing policy aims to protect children from harm including sale and supply of alcohol to children.

Sustainability Implications:

- 5.4 Licensing policy aims to prevent public nuisance and develop culture of live music, dancing and theatre.

SUPPORTING DOCUMENTATION

Appendices:

1. Appendix A – Part M Operating Schedule
2. Appendix B – Plan of Premises
3. Appendix C – Representations
4. Appendix D – Applicants response to representations
5. Appendix E – Map of area

Documents in Members' Rooms

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2026
[Statement of Licensing Policy 2026](#)

Home Office, Revised Guidance issued under section 182 of the Licensing Act 2003, February 2026 [Revised guidance issued under section 182 of Licensing Act 2003 - GOV.UK](#)

Public Health Framework for Assessing Alcohol Licensing – July 2025
[Public Health Framework for Assessing Alcohol Licensing | Tableau Public.](#)

Background Documents

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2026.
[Statement of Licensing Policy 2026](#)

Appendix A

M

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b, c, d and e) (please read guidance note 10)

1. Authorised staff employed by Sussex Police in the role of licensing officer shall have the right of access to the licensed premises during hours of operation for the purpose of inspection of the premises and premises records in order to ensure the promotion of the licensing objectives.

b) The prevention of crime and disorder

2. There will be no advertising of promotions/deals on any alcoholic product that can be seen from outside the premises including window posters and street signage.
3. All spirits to be behind the counter and beyond arms reach of customers.
4. No beer, lager, cider or perry with an ABV 6% or above shall be sold at the premises save that this shall not apply to premium beer, lager, cider or perry with an ABV 6% or above such as craft or speciality brands or brands produced by a micro-brewery, or brands produced to commemorate a national or local event.
5. All beer, larger and cider cans excluding premium and craft brands, will only be sold in multipacks of 4 or more cans.
6. The supply of alcohol will only be directly to the customers personally in store. There will be no delivery of alcohol products to customers.
7. Subject to GDPR guidance and legislation:
 - a) Digital CCTV and appropriate recording equipment to be installed in accordance with Home Office Guidelines relating to UK Police Requirements for Digital CCTV System (PSDB Publication Number 09/05), operated and maintained throughout the licensable area of the premises. The system shall be on and recording at all times the premises licence is in operation.
 - b) The CCTV cameras and recording equipment must be of sufficient quality to work in all lighting levels inside the premises at all times.
 - c) CCTV footage will be stored for a minimum of 31 days.
 - d) The management will give full and immediate cooperation and technical assistance to the Police in the event that CCTV footage is required for the prevention and detection of suspected or alleged crime.
 - e) The CCTV images will record and display dates and times, and these times will be checked regularly to ensure their accuracy.
 - f) The management of the premises will ensure that key staff are fully trained in the
 - g) operation of the CCTV and will be able to download selected footage onto a disk (or other electronic portable device acceptable to Police e.g. USB) or provide footage via an online link as initiated by Police, without difficulty or delay and without charge.
 - h) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable. This can be via email - brighton.licensing@sussex.police.uk.
 - i) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by Police or for any other reason, the premises will be expected to install a replacement hard drive or a temporary replacement drive as soon as practicable.
8. At all times the premises is open to the public, the management will have in place a backup services of a mobile support unit (MSU) or equivalent, with a minimum of 2 SIA registered Door Supervisors operating from it.
9. The premises will become a member of the Brighton Crime Reduction Partnership or similar scheme approved by the Licensing Authority. The scheme must operate, subject to local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and nighttime economy.
10. a) An incident log (either in electronic or written form) will be maintained by the premises

showing a detailed note of incidents that occur in the premises. The log will be inspected and signed off by the DPS (or a person with delegated authority) at least once a week.

- b) The logbook should be kept on the premises and be available for inspection at all times the premises are open by authorised officers of the Licensing Authority or the police. An incident will be defined as being one which involves an allegation of a criminal offence.
- c) Any refusals made for alcohol service e.g. underage, will also be recorded (either in electronic or written form) and feedback given to staff as relevant. The log will be kept for a minimum of twenty-four (24) months.

c) Public safety

None

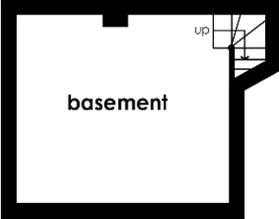
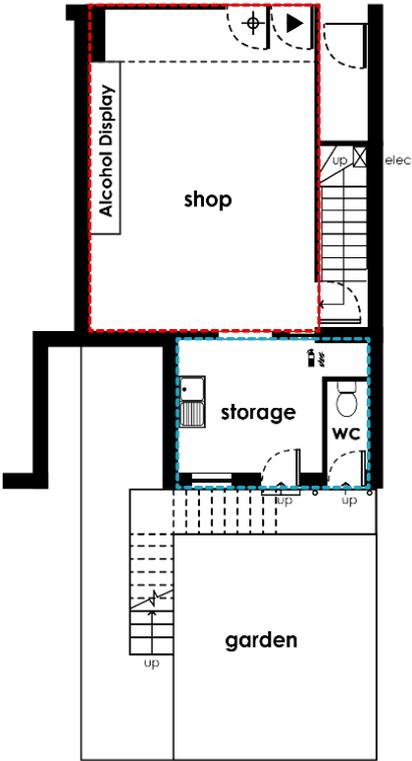
d) The prevention of public nuisance

- 11. Clear signage will remind customers to leave quietly and respect neighbours.
- 12. Deliveries, recycling and rubbish should not be dropped off, collected or placed outside except between the hours of 07:00 and 19:00.
- 13. No noise shall emanate from the premises nor vibration be transmitted through the structure of the premises that gives rise to a nuisance.

e) The protection of children from harm

- 14. The premises will operate a "Challenge 25" policy whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. The recommended forms of ID that will be accepted are passports, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID, biometric residence permit cards or proof of age cards bearing the 'PASS' mark hologram. The list of recommended forms of ID may be amended or revised with the prior written agreement of Sussex Police, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it.
- 15. Signage advertising the "Challenge 25" policy will be displayed in prominent locations in the premises.
- 16. a) The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training will take place prior to the selling of such products and will include:
 - The lawful selling of age restricted products – including but not limited to, the requirement of the staff member conducting the transaction to ensure they carry out Challenge 25 checks regardless of any other staff member checks that may already have taken place.
 - Refusing the sale of alcohol to a person who is drunk.
- b) Further verbal reinforcement/refresher training covering the above will be carried out thereafter at intervals not to exceed 12 weeks, with the date and time of the verbal reinforcement/refresher training documented.
- c) All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.

Appendix B



Key

- ▶ Exit Doors
- ⊕ Signage
- ⊗ Fire Warning System (Smoke Alarm)
- 🔥 Fire Extinguisher

Appendix C

REP A

-----Original Message-----

From: REDACTED

Sent: 28 January 2026 14:47

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Subject: 157 Dyke Road, BN3 1TJ [The Dials Convenience Store]

DL CON ENDS 19.02.2026 VALID PPN, PCD & PS (A)

Subject: Representation Objecting to Grant of New Premises Licence – [The Dials Convenience 157 Dyke Rd. BN3 1TJA]

Dear Licensing Authority,

I am writing to formally object to the application for a new premises licence for the sale of alcohol at [157 Dyke Rd, BN3 1TJ], pursuant to the Licensing Act 2003.

I am the owner of REDACTED an established off-licence business that has traded responsibly on the same street for over 20 years. My representation is made strictly in relation to the licensing objectives under the Act, as outlined below.

1. Prevention of Crime and Disorder

The street and surrounding area already experience persistent issues relating to anti-social behaviour, including loitering, street drinking, and incidents involving homeless and vulnerable individuals. The addition of yet another premises selling alcohol will, in my view, exacerbate these problems by increasing availability and accessibility of alcohol within a very concentrated area.

There are already five licensed premises selling alcohol in close proximity, excluding two Co-op stores, 4 public house located on the same area [pups] , and the applicant themselves already operates another licensed premises on the road directly behind this location. Granting an additional licence would further increase alcohol density in an area already under strain.

This increased concentration of licensed premises is likely to lead to:

- Increased street drinking
- Higher risk of alcohol-related disorder
- Greater demand on local police and council enforcement resources

2. Prevention of Public Nuisance

The existing levels of alcohol availability in the area already contribute to:

- Noise nuisance
- Congregation outside shops and licensed premises
- Littering (including bottles and cans)
- Public urination and intimidation of passers-by

The presence of a public house on the same street, combined with multiple off-licence outlets, already results in alcohol consumption spilling into the public realm. An additional off-

licence will unavoidably intensify these issues, particularly during evenings and weekends.

3. Public Safety

The saturation of alcohol outlets within a confined geographical area raises legitimate public safety concerns. Increased alcohol consumption in the vicinity correlates with higher risks of:

- Verbal and physical altercations
- Harassment of local residents and customers
- Unsafe street conditions, particularly for families, elderly residents, and vulnerable individuals

4. Cumulative Impact Considerations

While I appreciate that commercial competition alone is not a valid ground for objection, the cumulative impact of multiple licensed premises is a recognised and lawful consideration under the Licensing Act 2003.

The high density of alcohol outlets — including off-licences, a public house, and the applicant's existing licensed premises nearby — demonstrates that the area is approaching, if not already exceeding, a sustainable level of licensed activity. The cumulative impact of another licence has not been sufficiently addressed in the application.

Conclusion:

For the reasons set out above, I respectfully submit that granting this licence would undermine the licensing objectives, particularly in relation to the prevention of crime and disorder, public nuisance, and public safety.

I therefore request that the Licensing Authority refuse the application, or alternatively impose stringent conditions should the Authority be minded to grant it.

I would welcome the opportunity to address the Licensing Sub-Committee should this matter proceed to a hearing.

Yours faithfully,

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

REP B

From: REDACTED

Sent: 01 February 2026 13:46

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Cc: licensing@brighton-hove.gov.uk

Subject: Objection to Premises Licence Application – The Dials Convenience Store (157 Dyke Road, BN3 1TJ)

DL CON ENDS 19.02.2026 VALID PCD and PPN (B)

To the Regulatory Services Manager,

I am writing to formally submit my representation against the application for a new premises licence at 157 Dyke Road, BN3 1TJ (The Dials Convenience Store). I am a local resident and I believe that granting this licence will undermine the licensing objectives, specifically the prevention of crime and disorder and the prevention of public nuisance.

Grounds for Objection:

* **Cumulative Impact and Oversaturation:** The Seven Dials area is already densely served by alcohol retailers. There are numerous stores selling alcohol within a 50-metre radius of this site, including a 24-hour convenience store. Adding another outlet from 08:00 to 23:00 creates a "destination" for alcohol consumption that the area cannot sustain without further impact on the community.

* **Crime and Disorder:** The high concentration of off-licences in this immediate vicinity has already led to an increase in street drinking and aggressive begging. An additional supply point will likely exacerbate these issues, creating a haven for unruly characters and anti-social behaviour.

* **Public Nuisance:** Increased footfall from individuals seeking alcohol at all hours leads to increased litter, noise, and loitering. This negatively affects the quality of life for residents and the safety of the public using the Seven Dials thoroughfare.

The Seven Dials is a sensitive area with high foot traffic and residential density. Allowing yet another premises to sell alcohol for 15 hours a day is unnecessary and detrimental to the local environment.

I urge the Licensing Committee to refuse this application to protect the safety and well-being of the local community.

Name: REDACTED

Address: REDACTED Date: 01/02/2026

REP C

-----Original Message-----

From: REDACTED

Sent: 03 February 2026 10:02

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: Objection to premises license 157 Dyke Road, BN3 1TJ

DL CON ENDS 19.02.2026 VALID PCD (C)

To whom it may concern,

I am writing to object to the request for a premises license for 157 Dyke Road as a local resident. My understanding that the request is for a convenience store selling alcohol. The area is already saturated with these stores. There is another convenience store selling alcohol several shops away towards the roundabout. There are also two co-op stores selling alcohol very close by (one only two shops away). Within a five minute walk there are three such shops on Montefiore Road, a premier store on Prestonville Road and at least one more on Dyke Road on the otherwise side of seven dials all selling alcohol until late. There is also an independent wine shop less than five minutes walk away on Dyke Road.

With so many convenience stores selling alcohol I would strongly request that the request is turned down by the council as the market for such stores is over saturated already. Allowing another on to open is setting the store up to fail and / or will negatively impact on the other businesses.

Allowing further stores to sell alcohol for long hours will potentially cause anti- social behaviour and impact negatively on the local community.

Many thanks,

REDACTED

REDACTED

REP D

From: REDACTED

Sent: 06 February 2026 14:21

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: Representation Against Alcohol Licence Application — [The Dials, 157 Dyke Road, BN3 1TJ,]

DL CON ENDS 19.02.2026 VALID PCD and PCH (D)

To: Licensing Authority
Brighton & Hove City Council

Re: Representation Against Alcohol Licence Application — [The Dials, 157 Dyke Road, BN3 1TJ,]

Dear Sir/Madam,

I wish to **formally register my objection** to the above licensing application for premises situated at **premises at 157 Dyke Road**, on the grounds that granting this licence would undermine the licensing objectives as set out in the **Licensing Act 2003** — in particular:

- **the prevention of crime and disorder**
- **public safety**
- **the protection of children from harm**
- **the prevention of public nuisance**

These objections are made with regard to the context of our local area and the guidance under **Section 182 of the Licensing Act 2003**, which states that licensing authorities must consider the proximity of premises to schools and children's routes, and the need to protect children from harm including early exposure to alcohol and associated environments. It further recognises that **evidence linking premises and harms to children (e.g. emergency incidents, exposure risk) should be considered when determining applications.**

1. Local Environment & Proximity to Schools

The area around **Seven Dials and Prestonville in Brighton** is predominantly **residential**, with many families and **hundreds of children regularly walking past this site on their way to primary, secondary, and sixth-form schools**, placing the premises on the main footpaths used by students.

Adding another location whose **primary focus is the sale of alcohol (and associated products like vapes)** increases visible alcohol availability directly on children's routes and within sight of school-age pedestrians — heightening early exposure and normalisation of alcohol retail in a community context.

2. High Density of Alcohol Outlets

This part of Brighton already has a **high concentration of stores selling alcohol**, including:

1. Multiple existing shops with late licences within close walking distance (including 2 established late-licence premises and 2 Co-ops).
2. Recent openings of **two other late licence shops on Montefiore Road**.

This clustering contributes to an **unreasonably high number of licensed alcohol outlets in the midst of a residential area**, which is a relevant consideration under local licensing policy and Section 182 guidance on cumulative impact and risks posed by the local environment.

3. Public Health and Under-Age Drinking Risks

There is substantial evidence that **greater outlet density and visibility of alcohol retail access correlate with higher risk of underage purchasing and consumption**, and diminish community efforts to protect children's health. While public health is not itself one of the four licensing objectives, it is directly linked to the **protection of children from harm** statutory objective. Local licensing policy acknowledges that alcohol has significant impacts on community health and wellbeing, with efforts in Brighton & Hove targeting responsible retail practices and campaigns to reduce alcohol-related harm.

The presence of another alcohol-focused retail outlet will likely increase opportunities for underage access, proxy purchasing by adults for minors, and normalisation of alcohol in sight of children.

4. Crime & Disorder Context

Crime and anti-social behaviour factors must also be taken into account. Overall crime in Brighton & Hove — the local authority that includes Seven Dials and Prestonville — remains **higher than the national average**, with categories such as shoplifting, public order, and violent crime significantly represented.

At a more local level, crime data for **Prestonville Road reports a medium crime rate (circa 147 per 1,000 residents)** which includes public order and anti-social behaviour, both of which are often associated with increased alcohol availability and sales from existing businesses particularly linked to teenage students from the 6th form.

A further outlet with late-night availability of alcohol and related products is likely to exacerbate risks of disorder and nuisance associated with public drinking behaviour, especially in a predominantly residential community.

5. Statutory Guidance on School Proximity & Protection of Children

Under the statutory **Section 182 guidance**, licensing authorities are specifically directed to consider child protection through:

1. conditions regarding access by children
2. consideration of proximity to schools and youth clubs
3. ensuring that advertising is not displayed when children are nearby
4. and steps to protect children from moral, psychological, and physical harm associated with alcohol environments.

Given the **direct routes to local primary and one of the largest secondary schools and youth facilities nearby**, and the potential for children to pass this site — an alcohol-centric store — I submit that the application fails to demonstrate adequate mitigation of these risks, and that approval would be inconsistent with the licensing objective to protect children from harm.

Conclusion

In light of the:

- ✓ dense clustering of alcohol outlets in a predominantly residential area with high child footfall,
- ✓ known risks of normalisation of alcohol and underage access,
- ✓ public health concerns relevant to alcohol exposure of young people, and
- ✓ statutory licensing guidance which places explicit weight on the protection of children,

I respectfully request that the Licensing Authority **rejects this application** unless appropriate restrictions or significant conditions can be imposed to fully mitigate these risks — recognising that refusal is justified if granting the licence would undermine the licensing objectives.

Thank you for considering this representation. Yours

faithfully,

REDACTED
REDACTED

REP E

From: REDACTED

Sent: 11 February 2026 14:26

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: Objection to license application of The Dials convenience store .157, Dyke Road ,BN31TJ

DL CON ENDS 19.02.2026 VALID PCD (E)

To whom it may concern,

I'm writing to object to the granting of a license of the above premises ,on the grounds of anti-social behaviour, crime and nuisance .I'm a local resident and believe the granting of a license will increase all of the above .

There is already an over-saturation in the Dails area of convenience shops ,selling alcohol served by 2 Co-op 's and 2 convenience stores ,all with in 2 minutes walk of each other .

There is already anti-social behaviour , shop lifting and drinking . We have a homeless hostel near by and this causes aggressive begging in the area (i sometimes have to walk on the other side of the road) .

This is very small area (village)of Brighton and it would have a negative effect on this side of the Dails allowing alcohol to be sold for 15 hours a day . We have many students(under 18's) from the local 6 th form college (BHASVIC) who pass along that area every day.

The granting of the license would have a negative and detrimental effect for local shop keepers ,residents and students. It will change the nature of the Dails

Yours faithfully.

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

REP F

DL CON ENDS 19.02.2026 VALID PCD & PPN (F)



Regulatory Services – Licensing Team

Brighton & Hove City
Council 2nd Floor
Bartholomew House
Bartholomew Square
Brighton
BN1 1JP

Donna Lynsdale
Licensing Team
Brighton & Hove City Council
Bartholomew House
Bartholomew Square
Brighton
BN1 1JP

Date: 12 February 2026
Our Ref: 2026/00176/LICREP/EH
Phone: REDACTED
e-mail: REDACTED

Dear Donna

**Licensing Act 2003 - Representation regarding the application for Premises Licence for at The Dials Convenience Store, 157 Dyke Road, Hove
Premises Licence Application Reference - 2026/00236/LAPREN**

I refer to the application for a new Premises Licence for The Dials Convenience Store, 157 Dyke Road, Hove. The proposal is for the sale of alcohol off the premises Monday to Sunday 08:00 to 23:00

The Licensing Team, in its role as a Responsible Authority, has concerns about this application and therefore I am submitting this representation on the grounds of the Prevention of Crime and Disorder and the Prevention of Public Nuisance.

This premises is also situated on Dyke Road, which sits within the Licensing Authority's Special Stress Area (SSA).

As stated in the Council's Statement of Licensing Policy (SoLP), the SSA is deemed an area of special concern in terms of the levels of crime and disorder and nuisance experienced within it. Our SoLP states that new and variation applications for premises within the SSA will not be subject to the presumption of refusal, but operators will be expected to pay special attention when drawing up their operating schedules and to make positive proposals to ensure that their operation will not add to the problems faced in these areas.

Guidance issued under S182 of the Licensing Act 2003 states that in completing an operating schedule, applicants are expected to have regard to the statement of licensing

policy for their area. The guidance goes on to say that applicants are expected to include positive proposals in their application on how they will manage any potential risks. Where specific policies apply in the area (for example, SSA and matrix approach to decision making policies), applicants are also expected to demonstrate an understanding of how the policy impacts on their application, any measures they will take to mitigate the impact, and why they consider the application should be an exception to the policy.

On looking at the application form it is noted that the applicant had pre-consulted with Police Licensing and the Council Licensing Authority and has proposed robust conditions which have been agreed by the Police Licensing.

The Council's SoLP includes a Matrix approach for licensing decisions with provisions for a terminal hour for all classes of licensed premises in a particular area. The Matrix Model recognises the diverse operation and different risks presented by different classes of licensed premises. The SoLP provides a vision of what the Licensing Authority would like to see within its area and gives an indication of likelihood of success or otherwise to investors and local businesses making applications. Each application is still considered on its individual merit and there is discretion to depart from the Matrix approach policy in exceptional circumstances.

The decision-making Matrix of the Council's SoLP clearly shows that off licences in the Special Stress are not supported.

Granting this application may add to the additional burdens and problems in the Special Stress area. The Licensing Team act as guardians of the Council's SoLP and I make this representation on behalf of the Licensing Authority as I believe the application made is contrary to our policy and therefore invite the panel to carefully scrutinise the application and decide if it constitutes exceptional circumstances to depart from our policy.

Yours sincerely

Emma Grant

Licensing Officer
Licensing Team
Environmental Health and Licensing
Regulatory Services

REP G

From: REDACTED

Sent: 02 February 2026 19:07

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Subject: Licence - 1445/3/2026/00236/LAPREN

DL CON ENDS 19.02.2026 VALID PPN and PCD (G)

Dear licensing

I am writing to formally object to the application for an alcohol licence for the premises at 157 Dyke Road, Hove BN3 1TJ.

I live locally and would like to keep Seven Dials a place for the peaceful and friendly community we have here. We already have enough alcohol sales late into the night locally, we do not need any more!

I came across the application when passing the empty premises. The notice is shabby, very small and in the bottom of the doorway. I don't think it has been displayed with enough prominence to make the local community sufficiently aware that another shop selling alcohol into the evening is trying to move into the area. I believe the owner should be requested to display the notice again, more prominently and the consultation period should be extended.

This is a predominantly residential area with several schools nearby, and there are already numerous premises in the immediate vicinity licensed to sell alcohol. Granting an additional licence would contribute to over-provision and worsen existing issues in the community. Most local residents do not need another alcohol shop open into the night.

Residents already experience problems with noise disturbance, littering (including bottles and cans), traffic congestion from vehicles stopping outside shops, and people loitering in the area. As a woman, I would like to be able to get off the bus at Seven Dials late at night and walk home alone and not be subject to the threat of nuisance and disturbance. These issues raise concerns relating to public nuisance, public safety, and crime and disorder.

I am also concerned about the proposed hours of 8:00am to 11:00pm, which are excessively long for a residential area and are likely to increase disruption throughout the day and into the evening.

Given the proximity to schools and family housing, there are further concerns about the impact on children and young people.

For these reasons, I believe the application would undermine the licensing objectives and should be refused.

Yours faithfully,
REDACTED
REDACTED

REP H

From: REDACTED

Sent: 15 February 2026 14:16

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Subject: Application objection reg 157 Dyke Road BN3 1JJ

DL CON ENDS 19.02.2026 VALID PPN (H)

Good morning,

I hereby want to object to the proposed for an alcohol license for 157 Dyke Road BN3 1JJ at Seven Dials.

In the close vicinity of Seven Dials Roundabout we already have plenty of outlets (2 Co-ops, and three Convenience Stores) which have alcohol licenses and are open from early until late - 7 days a week.

Furthermore we have 4 pubs where you can consume alcohol.

Seven Dials is a family residential area - we have plenty outlets for a residential area to purchase alcohol and don't need yet another one. I am concerned about the increase in footfall and general traffic to the area late at night, and possibly effect on safety as well as noise and general disturbance.

Furthermore we are in close vicinity to BASVIC school with hundreds of teenagers spending their time at breaks exactly in the area of the proposed convenience store. This should be considered too in the decision making regarding this alcohol license application.

Kind regards

REDACTED
REDACTED
REDACTED

REP I

From: REDACTED

Sent: 17 February 2026 12:20

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: Opposition to proposed license at 157 Dyke Road, BN3 1TJ

DL CON ENDS 19.02.2026 VALID PPN and PCD (I)

Dear Sir/Madam,

I am writing to formally object to the application for a new off-licence to be opened at 157 Dyke Road, BN3 1TJ, which is located beneath my home.

I have serious concerns about the impact this premises will have on my safety, wellbeing, and quality of life. Unfortunately, I am already experiencing significant anti-social behaviour in the immediate area. There have been repeated incidents of intoxicated individuals defecating and urinating on my property, using my private bins to dispose of rubbish, and entering my clearly marked private property through my gated entrance without permission. There have also been multiple incidents of drunk people verbally abusing and using sexual language with the local college girls to such an extent that the police have had to be called.

The introduction of a new off-licence below my residence is likely to increase footfall, noise, loitering, and alcohol-related disorder in the immediate vicinity. Based on my existing experiences, I have genuine concerns that this will lead to further anti-social behaviour, increased public nuisance, and a deterioration in both public safety and residential amenity. In addition, there are already a number of existing shops within close proximity that sell alcohol. The area is therefore already well served by licensed premises, and there is no clear necessity for an additional off-licence at this location.

I am also extremely concerned about the proximity of this proposed premises to nearby schools and colleges. Increasing the availability and visibility of alcohol in such close proximity to educational establishments raises further concerns regarding community safety and the potential impact on young people.

The licensing objectives of preventing crime and disorder, preventing public nuisance, and protecting children from harm are particularly relevant in this case. Granting this licence risks exacerbating the problems already being experienced and would have a direct and negative impact on residents living immediately above and in the surrounding area. I therefore strongly object to this application and respectfully request that it be refused.

Thank you for your time and consideration.

Yours faithfully,

REDACTED
REDACTED

REP J

From: REDACTED

Sent: 19 February 2026 11:20

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: Objection to premises licence application — 157 Dyke Road, BN3 1TJ

DL CON ENDS 19.02.2026 VALID PCD, PPN and PCH (J)

Dear Madam/Sir,

I am writing to object to the proposed off-licence at this address, which REDACTED

#I am already dealing with ongoing anti-social behaviour in the immediate area and I am very worried that another alcohol outlet in this exact location will make the situation worse. On a regular basis I have to deal with drunk individuals urinating and defecating near and sometimes on my property, putting rubbish into my private bins inside my property, and coming through my clearly signed gated entrance without permission.

For around the past year I have effectively lost the use of my own wheelie bin because people repeatedly dump waste into it after buying alcohol from nearby off-licences. This is not a one-off issue — it is persistent and directly linked to alcohol sales in the area. Adding another off-licence below my home is very likely to increase this problem.

There have also been repeated incidents of intoxicated individuals verbally abusing and using sexual language towards local college girls, which has been serious enough to require police attendance. As a woman living directly above the proposed premises, this already makes me feel vulnerable. The thought of increased alcohol sales and the likely rise in loitering and late-night disturbance right outside my front door genuinely concerns me for my personal safety.

I also question the need for another off-licence here. There are already several (at least 6) nearby premises selling alcohol, so the area is not lacking provision.

More widely, I am concerned about the message this sends given the proximity to local schools and colleges, and about the impact on the character of the area. Our high street benefits from independent, family-run and family-friendly businesses that contribute positively to the community. Another off-licence risks undermining that balance.

Taking all of this into account, I believe granting this licence would undermine the licensing objectives around preventing crime and disorder, preventing public nuisance, and protecting children from harm. From my direct lived experience, the risk of worsening the current problems is very real.

I therefore respectfully ask that this application be refused.

Best Regards,
REDACTED
REDACTED

REP K

From: REDACTED

Sent: 13 February 2026 20:28

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Subject: Licence - 1445/3/2026/00236/LAPREN

DL CON ENDS 19.02.2026 VALID PCD and PPN (K)

Dear Licensing Team,

I am writing to make a representation regarding the application for a premises licence for The Dials convenience store, [157 Dyke Road, BN3 1TJ](#).

I am a local resident and my comments relate to the licensing objectives, particularly the prevention of crime and disorder, the prevention of public nuisance, and the protection of children from harm.

At present, this immediate area is generally settled and does not suffer significantly from street drinking or alcohol-related disturbance. My concern is that granting an additional licence for the sale of alcohol risks changing that balance by further increasing availability and convenience.

The shops are very close to residential streets, with many family homes nearby, and children and young people regularly pass through the area on their way to school or college, bus stops and local amenities.

While I appreciate that objections can't be made on need or market competition, there is already an abundance of licensed stores in a very small area, and additional supply may create new patterns of behaviour. Once established, these can be difficult to reverse and may place pressure on residents and local services.

I appreciate the applicant's right to apply for a licence, but I am not persuaded that another outlet at this location would promote the licensing objectives.

Thank you for taking my representation into account.

REDACTED

REDACTED

REP L

From: REDACTED

Sent: 17 February 2026 10:55

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Subject: Objection to license for The Dials Convenience Store 157 Dyke Road, BN3 1TJ

DL CON ENDS 19.02.2026 VALID PCD and PPN (L)

To the Licensing Department,

I am writing to formally register my objection to the licence application for the premises located at 157 Dyke Road, BN3 1TJ to become The Dials Convenience Store.

As a local resident, I believe that granting this licence, particularly for late-night alcohol sales, would undermine the following Licensing Objectives:

1. The Prevention of Public Nuisance

The proposed late-night hours are inappropriate for this residential area. An additional late-night outlet will lead to increased noise from customers arriving by car (engines idling and doors slamming) and increased pedestrian footfall late into the evening. This will significantly disturb the peace of nearby residents. Furthermore, the area already suffers from alcohol-related litter, and another off-licence will exacerbate the buildup of cans and glass in our streets.

2. The Prevention of Crime and Disorder

The immediate vicinity is already heavily saturated with similar outlets. We have a significant and visible population of individuals experiencing homelessness and street drinking in this specific area. Adding another point of sale for alcohol—especially one with late-night operating hours—will likely increase the incidents of alcohol-related antisocial behaviour, loitering, and aggressive begging.

The presence of another off-licence in such close proximity to existing ones creates a "honey pot" effect for disorder, which is already a strain on local resources and resident safety. I believe that an additional licence in this sensitive location will directly contribute to an increase in crime and disorder.

3. The Seven Dials area is already subject to a **Public Spaces Protection Order (PSPO)** for the consumption of alcohol to manage anti-social behaviour. Introducing another late-night off-licence directly conflicts with the council's existing efforts to manage alcohol-related disorder in this specific neighbourhood.

For the reasons stated above, I urge the Licensing Committee to refuse this application. Yours faithfully,

REDACTED
REDACTED
REDACTED

REP M

From: REDACTED

Sent: 15 February 2026 14:18

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Subject: Opposing Licence - 1445/3/2026/00236/LAPREN The Dials Convenience Store

DL CON ENDS 19.02.2026 VALID PCD and PPN (M)

From: REDACTED

REDACTED15th February 2026

Contact: REDACTED Sent to: ehl.licensing@brighton-hove.gov.uk

To the Brighton & Hove City Council Licensing Team

I wish to oppose the following application:

Licence - 1445/3/2026/00236/LAPREN The Dials Convenience Store

Applicant name: Isteph Ayoub Address: 157 Dyke Road, Hove, BN3 1TJ

My objections are on the following grounds:

1. Prevention of crime and disorder

There are already a high number of licensed premises in the immediate area that sell alcohol. This creates crime disorder and nuisance around the 7 dials. As a local shop owner, I am increasingly aware of the impact alcohol sales have in encouraging anti-social behaviour. My staff and I are aware of multiple instances of drunk individuals trying to access the alleyway and garden area behind my shop. They are very intimidating and challenging to deal with.

I am concerned that an additional early and late opening licensed premises will increase anti-social behaviour in the 7 dials area generally and specifically next door to my delicatessen.

2. prevention of public nuisance

I am concerned that adding more licensed premises to an area that already has so many will have a cumulative impact on existing issues.

3. public safety

A recent example includes: My staff calling the police 15/10/25 when two drunk men outside my shop were hanging around shouting and making lewd comments to young female students and followed one of the young women into my shop.

4. protection of children from harm

The area has a busy sixth form college BHASVIC with 2,500 pupils. I am concerned about the possible sale of alcohol and Vapes to young people under 18.

I wish to make it clear that I do not want to oppose business development in the 7 Dials area. I value good relationships with local shopkeepers and traders. I am worried about the number of businesses selling alcohol from early in the morning to late in the evening and the impact this has on the community.

Yours Sincerely

REDACTED

S1

From: REDACTED

Sent: 18 February 2026 01:21

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Subject: Re: Premises Licence Application – The Dials, 157 Dyke Road, Brighton BN3 1TJ

DL CON ENDS 19.02.2026 VALID PCD, PS, PPN and PCH (S1)

To: The Licensing Authority Brighton & Hove City Council

I am writing to formally express my full support for the premises licence application submitted by Mr Isteph Ayoub in respect of The Dials, 157 Dyke Road, Brighton BN3 1TJ. I understand that the application relates to the sale of alcohol for consumption off the premises between the hours of 08:00 and 23:00. I have known Isteph for a considerable period of time and can confidently state that he is a trustworthy, responsible and hardworking individual. He is young, motivated and fully committed to operating a lawful and well-managed business. He listens carefully, respects regulations and would not wish to cause harm, nuisance or disruption to the local community. I am aware that conditions have been agreed with Sussex Police and the Licensing Authority.

Based on my knowledge of his character and professionalism, I am confident that he will strictly adhere to all agreed conditions and promote the four licensing objectives at all times:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

I firmly believe that the premises will be operated responsibly, with proper age verification procedures, clear management oversight, and full compliance with licensing requirements. Isteph would not jeopardise his business or reputation by allowing irresponsible practices. I respectfully request that the Licensing Authority take my support into careful consideration when determining this application.

Yours faithfully,

REDACTED
REDACTED
REDACTED

APPENDIX D

RESPONSE TO REP A

From: isteph Ayoub REDACTED

Sent: 30 January 2026 15:31

To: REDACTED; EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: RESPOND TO REPRESENTATION- The Dials Convenience Store, 157 Dyke Road, Brighton, BN3 1TJ

Dear REDACTED

I hope this email finds you and your family well.

Please find attached a letter addressing the concerns you raised. I have carefully considered each point and have sought to respond in a clear, respectful, and constructive manner. I hope the information provided offers reassurance and clarity.

Should you wish to discuss any aspect further or require additional information, please do not hesitate to contact me. I would be more than happy to assist.

Kind regards,
Isteph Ayoub

Response to Representation – Premises Licence Application

Applicant: Isteph Ayoub

Premises: 157 Dyke Road, BN3 1TJ

Contact Number: REDACTED

Dear REDACTED

I write this response in respect of the representation you submitted in relation to my application for a new premises licence. I do so respectfully and with full regard to the Licensing Act 2003 objectives.

First and foremost, I wish to make clear that my application is modest, tightly controlled, and significantly more restricted than the existing alcohol provision you operate on the same road. My application is limited strictly to the sale of alcohol between **08:00 and 23:00**. In contrast, your premises currently benefits from a **24-hour alcohol licence**. It is therefore difficult to reconcile concerns regarding late-night disorder and pressure on police or council resources with the fact that your business continues to sell alcohol throughout the night, when such risks are widely acknowledged to be greatest.

A further key distinction between our respective operating models is the **strength and format of alcohol sold**. Your premises stocks and sells a very large range of **high-strength beers and ciders**, including products at significantly higher ABV levels, many of which are sold **as single units**. By contrast, as part of proactive engagement with the Licensing Authority, I have **formally agreed** that my premises will:

- Not sell high-strength beers or ciders
- Sell alcohol **only in multipacks of four or more**
- Operate strict refusals and a Challenge 25 policy

These measures are specifically designed to discourage street drinking, reduce impulsive consumption, and protect vulnerable individuals. On this basis, I firmly maintain that my premises is highly unlikely to contribute to the issues described in your representation, and that my operating model is substantially lower risk.

You have placed significant reliance on the number of existing licensed premises in the vicinity, including Co-operative stores. I respectfully submit that the mere presence of other licensed premises is not, in law, a determinative factor and does not of itself justify refusal. The Licensing Act 2003 requires that each application be assessed on its own merits, with reference to evidence that the grant of a licence would undermine the licensing objectives.

It is also relevant that large national operators such as the Co-operative Group operate under highly standardised and tightly regulated models, with strict refusals policies, controlled product ranges, and robust compliance systems. Their presence does not automatically give rise to cumulative impact, nor has evidence been presented to demonstrate that these premises are a source of the issues described.

My proposed operation is demonstrably more restrictive than a typical off-licence. Alcohol sales are limited to 08:00–23:00, high-strength alcohol will not be stocked, and alcohol will be sold only in multipacks of four or more. These conditions materially reduce the risk of street drinking, impulsive consumption, and associated nuisance. On this basis, I respectfully submit that my application does not add to cumulative impact and is fully aligned with the licensing objectives.

You have also raised the issue of cumulative impact by reference to my operation of another premises nearby. I would like to clarify that the business is run jointly by myself and my brother. I am 24 years old and my brother is 26. We have operated our existing shop for over **five years** without a single review, warning, or enforcement issue. Despite starting the business at a young age, we have consistently demonstrated maturity, responsibility, and full compliance with licensing conditions and council guidance.

We are now at a stage in our lives where we wish to progress personally and professionally. Our intention in applying for a second premises is not to increase risk, but to allow each of us to operate a business independently so that we can build stable futures, get married, and establish our own households. This is a legitimate and reasonable progression for two young business owners who have already proven their ability to operate responsibly within the licensing framework.

Finally, I wish to emphasise that competition itself is not a licensing consideration, and my application should be judged on its own merits. I respectfully submit that my operating schedule, reduced hours, refusal to sell high-strength or single alcohol products, and strong compliance record all demonstrate that granting this licence would not undermine the licensing objectives of crime prevention, public safety, or public nuisance.

I remain fully committed to working constructively with the Licensing Authority, Sussex Police, and Environmental Health, and I would welcome the opportunity to address the Licensing Sub-Committee should this application proceed to a hearing.

Yours sincerely,
Isteph Ayoub
Applicant
REDACTED

RESPONSE TO REP B

From: isteph Ayoub REDACTED

Sent: 02 February 2026 16:36

To: REDACTED; EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: RESPONSE TO THE OBJECTION

Dear REDACTED

I hope you are well.

Thank you for taking the time to share your concerns regarding my premises licence application. Please find attached a letter that responds to the points you raised and outlines the measures and conditions in place to ensure the premises operates responsibly and in a way that protects the local community.

If you have any questions or would like to discuss this further, please do not hesitate to get in touch.

Kind regards,

Isteph Ayoub
REDACTED

**Response to Your Objection – The Dials Convenience Store
157 Dyke Road, Hove, BN3 1TJ**

Dear REDACTED

Thank you for your written objection and for taking the time to outline your concerns regarding my application for a premises licence at The Dials Convenience Store. I recognise that Seven Dials is a busy area with a high residential density, and I understand why residents are understandably cautious about any new premises selling alcohol. I would therefore like to respond directly to the points you raised and explain how the operation of this premises has been carefully designed to address those concerns.

First, in relation to cumulative impact and the concern that the area is already well served by alcohol retailers, it is important to clarify how this premises will operate. The licence sought permits the sale of alcohol only between 08:00 and 23:00. This is not a late-night or 24-hour operation, and it is significantly more restricted than some existing nearby premises. The intention is not to create a destination for alcohol consumption, but to operate a local convenience store serving nearby residents within clearly defined hours.

I have also agreed a robust and enforceable set of conditions with Sussex Police and the Licensing Authority specifically aimed at reducing the risk of street drinking and anti-social behaviour. These include restrictions on high-strength alcohol products, with no beer, lager, cider or perry above 6 percent ABV being sold other than genuine premium or craft products. In addition, standard beers and ciders may only be sold in multipacks of four or more, and single-can sales are prohibited. These measures are widely recognised as effective in discouraging immediate consumption in the street, and consequently will diminish the possibilities of littering and loitering.

Further safeguards are in place in relation to crime and disorder. Alcohol promotions or deals will not be advertised in a way that is visible from outside the premises, and all spirits will be kept behind the counter and out of customers' reach. There will be no delivery of alcohol products from the premises, ensuring that all sales are face-to-face and fully supervised. A comprehensive digital CCTV system to police standards will operate at all times the premises is open, with footage retained for a minimum of 31 days and made available to police upon request.

In addition, an incident and refusals log will be maintained and regularly reviewed, and the premises will participate in a local crime reduction partnership. Sussex Police licensing officers also have the right of access to the premises during operating hours to inspect records and ensure compliance with the agreed conditions. These measures provide ongoing oversight and accountability, rather than relying on goodwill alone.

I also understand your concerns regarding public nuisance, including noise, litter and loitering. Conditions are in place requiring customers to be reminded to leave quietly and respect neighbours, and deliveries, recycling and waste collection are restricted to daytime hours only. No noise or vibration may emanate from the premises in a way that causes nuisance. Staff will be instructed to actively monitor the immediate frontage of the store and to discourage loitering or disruptive behaviour, with service refused where appropriate and incidents recorded.

Finally, the protection of children from harm is taken extremely seriously. The premises will operate a strict Challenge 25 policy, supported by prominent signage. All staff engaged in the sale of alcohol must receive documented induction training before being allowed to sell alcohol, with regular refresher training thereafter. These training records must be made available to the authorities on request.

I appreciate that objections such as yours are raised out of concern for the local community. My intention is to operate a responsible, well-managed convenience store that complies fully with the licensing objectives and respects those who live nearby. I hope this response clarifies how the agreed conditions directly address the issues you have raised.

Yours sincerely,

Isteph Ayoub
Applicant
The Dials Convenience Store

RESPONSE TO REP C

From: isteph Ayoub REDACTED

Sent: 03 February 2026 23:46

To: REDACTED; EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: RESPONSE TO REPRESENTATION- The Dials Convenience Store, 157 Dyke Road, Brighton, BN3 1TJ

Dear REDACTED

I hope you are well.

Please find attached my response addressing the concerns raised in your representation regarding the premises licence application at 157 Dyke Road.

If you have any questions, please do not hesitate to get in touch.

Kind regards,
Isteph Ayoub

Response to Representation – Premises Licence Application 157 Dyke Road, BN3 1TJ

Dear REDACTED

Thank you for taking the time to submit your representation regarding my application for a premises licence at 157 Dyke Road. I appreciate you sharing your concerns as a local resident, and I would like to respond to them directly.

I understand your concern about the number of premises in the area that are licensed to sell alcohol. However, I would like to respectfully clarify that the presence of other off-licences or convenience stores nearby is not, in itself, a valid reason for refusing a premises licence. Under the Licensing Act 2003, applications are assessed solely on how they promote the four licensing objectives, rather than on issues of market saturation or competition between businesses.

In relation to your concerns about potential anti-social behaviour, I would like to reassure you that I have worked closely with the Licensing Authority and Sussex Police to agree a clear and enforceable set of conditions for the premises. These include restricted hours for alcohol sales, the installation and ongoing use of CCTV, a strict Challenge 25 age-verification policy, comprehensive staff training, and the maintenance of refusal and incident logs. Alcohol will not be sold as single high-strength cans or bottles, and all sales will be managed responsibly to reduce the risk of street drinking.

The premises will operate as a professionally managed local convenience store and not as a late-night or high-risk alcohol outlet. The agreed hours are more limited than those of some nearby premises, and the way the store will be run has been specifically designed to support the local community. These measures will help to prevent nuisance and anti-social behaviour and, consequently, will diminish the possibilities of littering and loitering.

I hope this response reassures you that careful thought has been given to how the premises will operate and how the local area will be protected. I remain committed to running the business responsibly and to working positively with the council and local residents.

Yours sincerely,

Isteph Ayoub
Applicant

RESPONSE TO REP D

From: isteph Ayoub REDACTED

Sent: 15 February 2026 14:37

To: REDACTED EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: Response to the Rep of 157 DYKE ROAD

Dear REDACTED

Please find attached my letter responding to the concerns you have raised in relation to the new premises application.

I trust this clarifies the safeguards and measures that will be in place. Should you require any further information, I would be pleased to discuss this with you.

Kind regards,
Isteph Ayoub
REDACTED

Dear REDACTED

Thank you for your representation in relation to my application for a premises licence at The Dials, 157 Dyke Road, BN3 1TJ. I am grateful for the opportunity to respond directly and to clarify how the operation of the premises has been specifically structured to promote and uphold the licensing objectives under the Licensing Act 2003 and in accordance with the Brighton & Hove City Council Statement of Licensing Policy and the statutory guidance issued under Section 182.

I wish to confirm at the outset that the premises is not intended to operate as an alcohol-led business. Alcohol sales will form part of a wider convenience retail offer and will be subject to robust safeguards that have been agreed with Sussex Police, Environmental Health, and the Licensing Authority. These conditions are proportionate, enforceable, and tailored to the local area.

Protection of Children from Harm

I fully recognise that the protection of children from harm includes moral, psychological, and physical harm. I have carefully considered the proximity of schools and routes used by children. To address this:

- A strict Challenge 25 policy will operate at all times.
- All staff will receive documented training in age verification and proxy purchasing prevention.
- A refusals log and incident log will be maintained and made available for inspection.
- Comprehensive CCTV coverage will be in place.
- There will be no external advertising or window displays promoting alcohol.

Importantly, spirits will be stored behind the counter and not accessible for self-selection. This measure provides an additional layer of control and supervision over higher-strength products and significantly reduces the risk of underage access or impulsive purchasing.

Prevention of Crime and Disorder

The operating schedule has been designed to ensure that the premises does not contribute to crime, disorder, or anti-social behaviour. There will be no consumption of alcohol on the premises. High-strength beers and ciders will not be sold. Alcohol will be sold only in multipacks, with no single-can sales, specifically to discourage street drinking and associated disorder.

The hours applied for are modest and do not extend into late-night trading periods commonly associated with increased alcohol-related harm. The premises will operate responsibly, with clear management oversight, CCTV monitoring, and full cooperation with responsible authorities.

Prevention of Public Nuisance

I am mindful of the need to ensure that the operation does not give rise to public nuisance. The premises will be managed to prevent loitering and ensure customers disperse quietly. The absence of single-can sales, high-strength alcohol, and on-site consumption materially reduces the likelihood of nuisance occurring. The frontage will be monitored and managed to maintain a tidy and orderly environment.

Density of Premises and Individual Merits

While I understand concerns relating to outlet density, licensing law requires each application to be determined on its individual merits. This application includes a comprehensive and carefully considered set of conditions that distinguish it from other premises operating with longer hours or higher-risk product ranges.

Conclusion

I respectfully submit that the agreed conditions and operating measures directly promote the licensing objectives and reflect the expectations of Brighton & Hove City Council's policy framework. My intention is to operate a responsible, community-focused business that works positively with residents and responsible authorities.

In light of the safeguards outlined above, I respectfully invite you to reconsider your representation. I remain open to further dialogue should you wish to discuss any aspect of the application in more detail.

Yours sincerely,

Isteph Ayoub
REDACTED

RESPONSE TO REP E

From: isteph Ayoub REDACTED

Sent: 15 February 2026 15:17

To: REDACTED; EHL Licensing <EHL.licensing@brighton-hove.gov.uk>

Subject: Response to the Rep Of 157 DYKE ROAD

Dear REDACTED

Please find attached my response addressing the concerns you raised regarding the new premises.

I hope this provides reassurance as to how the licensing objectives will be upheld. If you would like to discuss any aspect further, please do not hesitate to contact me.

Kind regards,
Isteph Ayoub

Dear REDACTED

Thank you for your representation in relation to my premises licence application for The Dials Convenience Store, 157 Dyke Road, BN3 1TJ. I genuinely appreciate you taking the time to express your concerns as a local resident.

I would like to respond directly and transparently to the points you have raised. The operation of the premises has been carefully structured to promote the licensing objectives under the Licensing Act 2003, particularly the prevention of crime and disorder, the prevention of public nuisance, and the protection of children from harm.

Prevention of Crime and Disorder

I fully acknowledge that there are existing concerns in the wider area relating to anti-social behaviour, shoplifting and street drinking. However, licensing decisions must be based on evidence relating to the specific premises and the conditions attached to it.

This application includes robust and enforceable conditions agreed with Sussex Police, Environmental Health and the Licensing Authority, including:

- A comprehensive CCTV system covering internal and external areas, with recordings retained and made available upon request.
- Maintenance of refusals and incident logs.
- A strict Challenge 25 policy with documented staff training in age verification, proxy purchasing prevention and conflict management.
- No sale of high-strength beers or ciders.
- No single-can sales – alcohol will be sold in multipacks only.
- No consumption of alcohol permitted on the premises.

Importantly, all spirits will be stored behind the counter and will not be available for self-selection. This provides direct supervision and an additional safeguard over higher-strength products.

In addition, and significantly, at all times the premises is open to the public, management will have in place a backup service of a Mobile Support Unit (MSU) or equivalent, with a minimum of two SIA-registered door supervisors operating from it. This provides access to immediate professional support should any incident arise.

Furthermore, the premises will become a member of the Brighton Crime Reduction Partnership (BCRP) or similar scheme approved by the Licensing Authority. This includes participation in the radio scheme and the exclusion/banning scheme of named individuals. This ensures real-time communication with neighbouring businesses and authorities and demonstrates a proactive approach to tackling local crime and disorder.

These measures go beyond what is typical for a small convenience store and are specifically designed to ensure the premises contributes positively to the area rather than negatively.

Prevention of Public Nuisance

The premises will operate within modest hours and does not seek late-night trading. The absence of single-can sales, high-strength alcohol, and on-site consumption materially reduces the likelihood of loitering or street drinking.

The frontage will be monitored and actively managed to discourage gathering and to maintain a tidy and orderly environment.

Protection of Children from Harm

I am fully aware of the proximity of BHASVIC and the presence of students in the area. Challenge 25 will be strictly enforced at all times. Staff training will be documented, refusals recorded, and there will be no external advertising or window displays promoting alcohol.

The premises is not intended to operate as an alcohol-led business. Alcohol will form part of a broader convenience retail offer and will be responsibly managed.

Density of Premises

While I understand concerns regarding the number of existing outlets, licensing law makes clear that applications must be determined on their individual merits. Competition between businesses or generalised concerns about saturation are not, in themselves, grounds for refusal unless it can be demonstrated that granting the licence would undermine the licensing objectives.

Given the comprehensive and enhanced conditions outlined above — including MSU support and BCRP membership — I respectfully submit that this application is both responsible and proportionate.

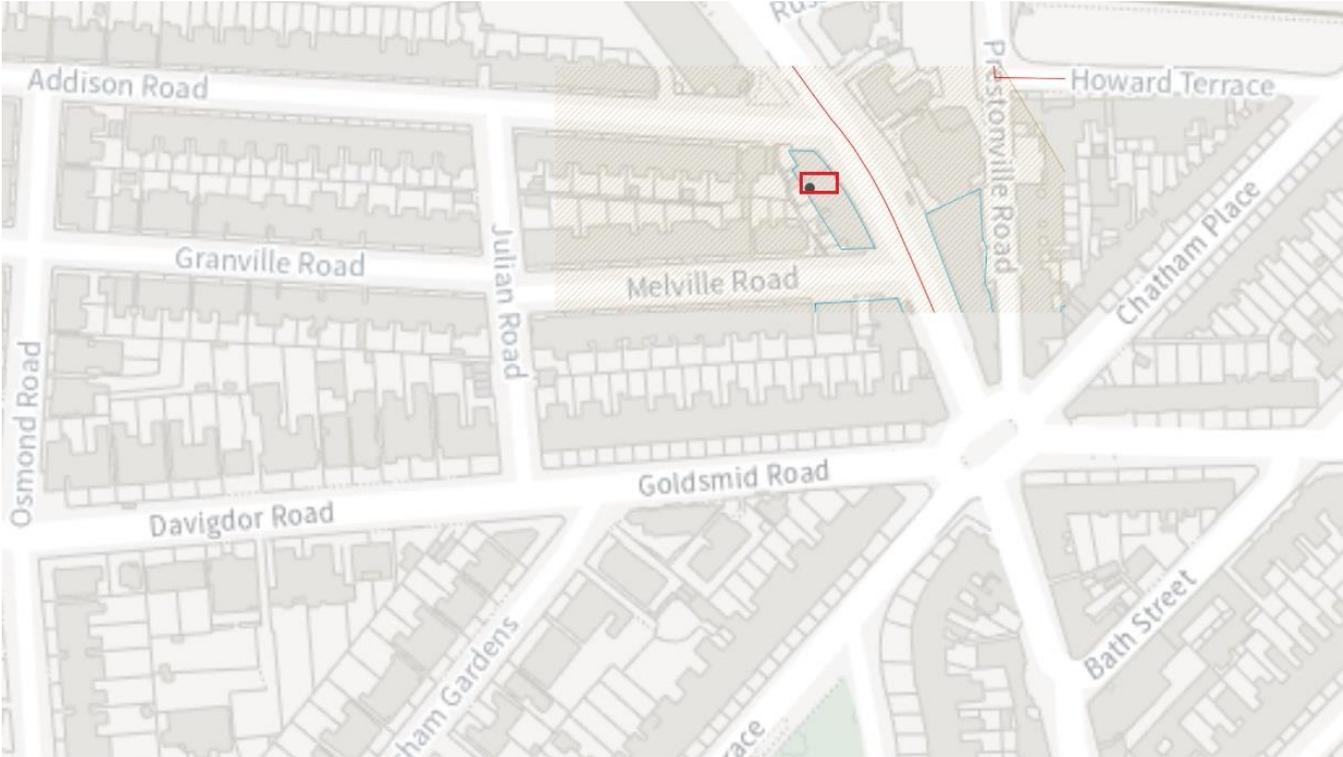
Conclusion

My intention is to operate a responsible, community-focused business that works constructively with residents, neighbouring businesses and the responsible authorities. In light of the safeguards outlined above, I respectfully invite you to reconsider your representation. I remain open to constructive dialogue should you wish to discuss any aspect of the application further.

Yours sincerely,

Isteph Ayoub
REDACTED

Appendix E



Document is Restricted

Document is Restricted

